

E6  
9/29/81  
1 47834

SEP 29 1981

CERTIFIED MAIL NO. 158506  
RETURN RECEIPT REQUESTED

Mr. Jack Molloy, Plant Manager  
William G. Krummrich Plant  
Monsanto Company  
P.O. Box 606 Monsanto  
East St. Louis, Illinois 62202

Re: Information Disclosure

Dear Mr. Molloy:

Notice is hereby provided to Monsanto Company (Monsanto), pursuant to 40 CFR 2.302(h)(2)(iii), that this office of the United States Environmental Protection Agency (U.S. EPA) intends to provide, on or after the sixth working day following your receipt of this letter, to its contractor and authorized representative, Envirodyne Engineers, Incorporated (Contract No. 68-02-3178), the information, claimed confidential by Monsanto, described as follows:

1. Information submitted previously to Region V and/or the Effluent Guidelines Division of U.S. EPA by Monsanto in response to inquiries under the authority of §308 of the Clean Water Act, and
2. All future responses by Monsanto to the information request from Sandra S. Gardebring to you, dated September 2, 1981, that are received by U.S. EPA during the life of Contract No. 68-02-3178.

Please address any comments you may have to me at the address above, or call me or Jon Barney of my staff at (312) 353-2098.

Sincerely yours,

Glenn D. Pratt, Acting Chief  
Permit Branch (5EP)

cc: Brent J. Gilhousen, Environmental Attorney  
Monsanto Company, St. Louis

bcc: Gardebring/Bryson/Fenner  
Pratt/Newman  
Barney/Narutis  
Jacobs ✓

005264

E6  
9/29/81  
147834

SEP 29 1981

CERTIFIED MAIL NO. 158506  
RETURN RECEIPT REQUESTED

Mr. Jack Molloy, Plant Manager  
William G. Krummrich Plant  
Monsanto Company  
P.O. Box 606 Monsanto  
East St. Louis, Illinois 62202

Re: Information Disclosure

Dear Mr. Molloy:

Notice is hereby provided to Monsanto Company (Monsanto), pursuant to 40 CFR 2.302(h)(2)(iii), that this office of the United States Environmental Protection Agency (U.S. EPA) intends to provide, on or after the sixth working day following your receipt of this letter, to its contractor and authorized representative, Envirodyne Engineers, Incorporated (Contract No. 68-02-3178), the information, claimed confidential by Monsanto, described as follows:

1. Information submitted previously to Region V and/or the Effluent Guidelines Division of U.S. EPA by Monsanto in response to inquiries under the authority of §308 of the Clean Water Act, and
2. All future responses by Monsanto to the information request from Sandra S. Gardebring to you, dated September 2, 1981, that are received by U.S. EPA during the life of Contract No. 68-02-3178.

Please address any comments you may have to me at the address above, or call me or Jon Barney of my staff at (312) 353-2098.

Sincerely yours,

Glenn D. Pratt, Acting Chief  
Permit Branch (5EP)

cc: Brent J. Gilhousen, Environmental Attorney  
Monsanto Company, St. Louis

bcc: Gardebring/Bryson/Fenner  
Pratt/Newman  
Barney/Narutis  
Jacobs ✓

005264

FOR PROJECTS SUPPORTED BY  
INDUSTRIAL ENVIRONMENTAL RESEARCH LABORATORY  
OFFICE OF RESEARCH & DEVELOPMENT/ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NORTH CAROLINA 27711

Project title: Detailed Toxicant Process Evaluation of Monsanto Company, Sauget, Illinois

Contractor name, division: Envirodyne Engineers, Inc.

Contractor project manager: Thomas M. Lachajczyk

314-434-6960

Address: 12161 Lackland Road, St. Louis, Missouri

Phone  
63141

Street

City

State

Zip code

A project officer: Alice Gagnon/Jon Barney

1 6 8 0 2 3 1 7 8

Contract No.

9 0 1 0

Task/TD No.

12 0 8 1 0 8 1

Date work plan submitted

18 B

01 21 0 8 0 6 8 1

Project start date

27 0 2 0 6 8 2

Project completion date.

Check one:

33

X

Original

34

Revision

Project location:

35 M O

State

37 6 3 1 4 1

Zip code

St. Louis

City

St. Louis

County

USA

Country

Project type: Contract

Reason for revision: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\$57,045 excluding fee

Costs: Estimated contract cost

\$4084.96

Contract fee

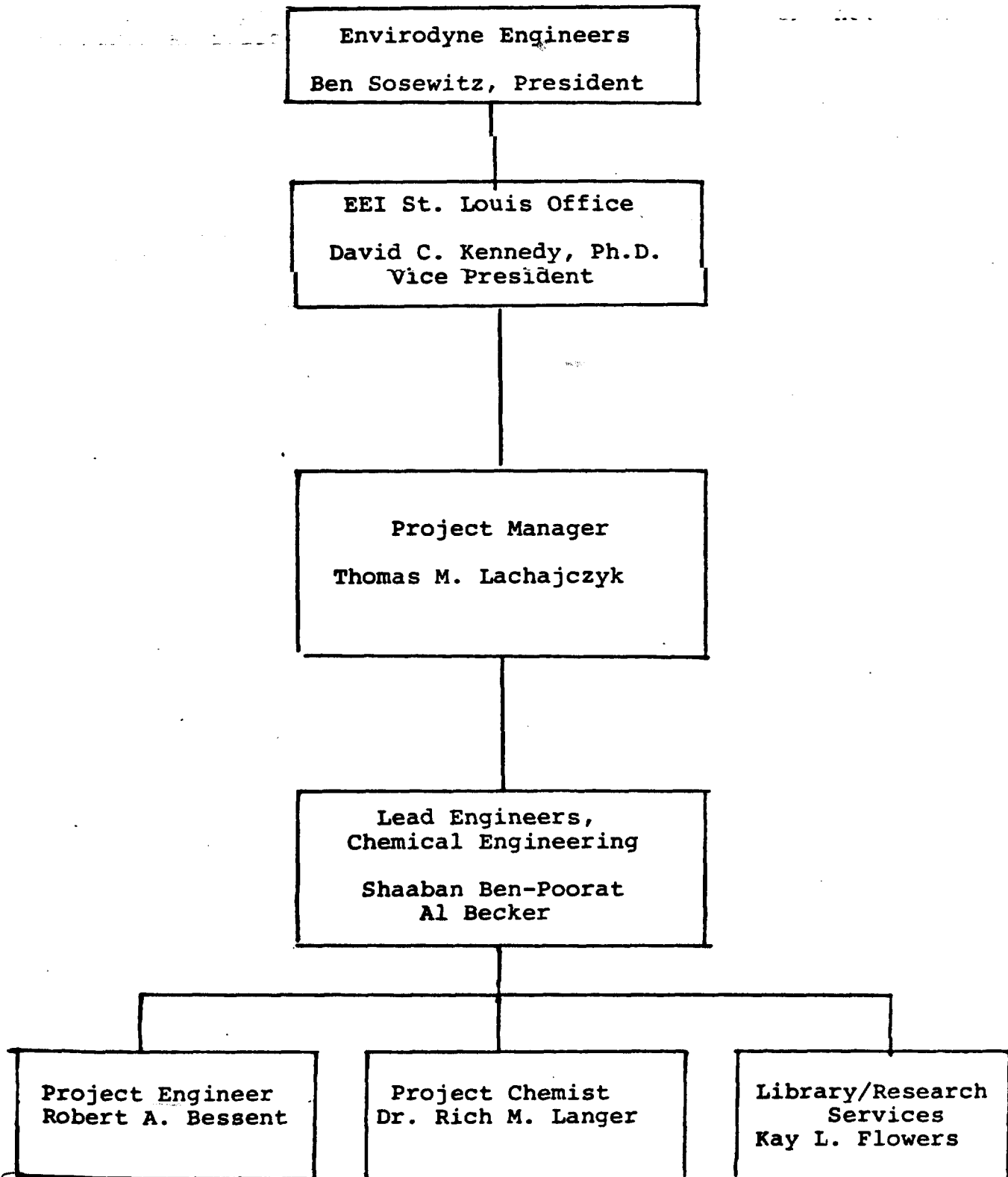
Project objective (50 typed characters- elite - 12 pitch).

21 Investigate toxic  
discharges; recommend  
pretreatment.

77  78  79  80   
a b c d

DO NOT WRITE IN THIS SPACE

### 3.0 Project Organization Chart



015166

## PROJECT ORGANIZATION

Dr. David C. Kennedy is the St. Louis Office Manager and a Ph.D. chemist. He is authorized to act in financial matters and will serve as project principal. He is projected to spend 88 hours in the project. He will provide advice to the project team, assist in solution of problems of exceptional difficulty, participate in meetings and inspections at the plant, and review project reports.

Mr. Thomas M. Lachajczyk is the Project Manager. He will develop project plans, schedules and budgets, submit monthly progress reports, co-ordinate project meetings and data collection trips, contact information sources by telephone, provide guidance and interpretation of the scope of work to the project team, participate in the technical analysis, and review all reports. He has eight years experience including extensive participation in effluent guideline development for the chemical, rubber, adhesive, iron and steel, petroleum, and timber products industries. He has managed nine previous assignments under this contract.

Mr. Albert P. Becker and Mr. Shaaban Ben-Poorat are chemical engineers with three and twelve years professional experience, respectively. They will conduct chemical engineering analyses of the production operations at the plant, preside at the plant meetings, develop and analyze 308 letters, assess toxicity of individual waste streams, and prepare project reports. Both individuals have been primary participants in the previous work assignment #9 and are familiar with production of pesticides, organic and inorganic chemicals, pigments, and synthetic resins.

Mr. Robert A. Bessent, MS. in Environmental Engineering, and Dr. Richard Langer, Ph.D. in Bio-chemistry, will also participate in the project. These individual each have eight or more years of professional experience and have conducted air, water, and hazardous waste plant inspections and monitoring programs at twenty-five or more chemical plants. Each has participated extensively in EPA/EGD activities. They will take part in data collection activities, and will assist in the chemical engineering analysis of production processes, wastewater toxicity, and pre-treatment requirements.

Ms. Kay Flowers will provide assistance in library research. She has more than 10 years experience in this role at EEI. Ms. Flowers will acquire technical literature for project participants at their request.

605567

## 5.0 PROJECT DESCRIPTION

### a) Technical Objectives

The objective of Work Assignment #10 is to investigate production operations and associated discharges of toxic materials from the Monsanto Company Krumrich Plant in Sauget, Illinois. During the course of the Work Assignment, Envirodyne Engineers, Inc. (EEI) will update EPA's information concerning the identities, amounts, and methods of production of specific products, housekeeping procedures, in-plant pollution abatement procedures, and wastewater treatment or pretreatment facilities in place or planned at the plant. The study shall focus on discharge of environmentally significant amounts of toxic materials that are non-biodegradable, bio-accumulative, potentially bio-magnified, carcinogenic, and/or mutagenic.

The duration of the program is six months. The study will include two phases: initial process reviews and detailed process evaluations. The subject plant produces at least 45 major products. A primary objective of the initial process review will be the identification of those processes responsible for discharge of the majority of toxic materials. This phase will result in recommendations concerning the need for more detailed evaluation of specific processes. These more detailed evaluations will be conducted during the second phase of the study. This phase will include assessments of health risks associated with current operations, design of monitoring programs to provide additional information, if necessary, and recommendations concerning potential pretreatment requirements.

### b) Technical Approach

EEI will utilize a chemical engineering approach, whereby the raw materials, products, catalysts, solvents, by-products, raw material contaminants, production processes, chemical reactions, water uses, and treatment systems used at each plant are assessed to predict the potential generation and discharge of toxic materials. At the beginning of the initial phase, a 308 letter will be sent to the facility, requesting basic information concerning production and wastewater generation. Further information concerning each production process will be compiled and analyzed from sources such as 308/letters, discharge permits, and design criteria for the regional wastewater treatment plant being designed. The toxicity of effluents from these processes will be assessed based on any previous plant-specific studies or standard reference materials. A report will summarize recommendations concerning further study.

The detailed process evaluations will provide an in-depth examination of specific process wastes of concern. The evaluation will include in-plant inspections of the specific processes and the section 308 letter will allow requests for sensitive information. Plant inspections will be conducted by the chemical engineers and chemists after research into the potential toxic nature of process discharges. A final report will summarize the findings and provide detailed recommendations concerning monitoring, toxicity, pretreatment.

#### c) Risks Anticipated and Technical Probability of Success

Successful and timely completion of the project depend upon a) early notification by USEPA Region V to plant representatives concerning the intended studies b) co-operation of USEPA Effluent Guidelines Division, which will be expected to supply Section 308 questionnaires and other pertinent information c) co-operation and co-ordination with plant representatives, lack of legal, confidentiality, and scheduling problems, and d) availability of information from state and local sources.

Steps have been initiated immediately upon receipt of the Work Assignment to bring about the co-operative efforts described above. We have advised the project officer that a 308 letter should be sent to the Monsanto Company as soon as possible, notifying them of the study in order to induce timely co-operation and essential technical input. A project initiation meeting has been scheduled to insure proper dissemination of information available in Region V offices. EEI has also contacted Mr. Sidney Jackson of EPA/EGD and scheduled a meeting for the week of August 17. We will also contact other information sources, such as EGD contractors and state and local agencies, both by telephone and in writing at the very beginning of the project. In order to avoid delays during the holiday season, we plan to complete the technical effort before the Christmas season.

The greatest risk to the program which we can do little to affect is co-operation from the Monsanto Company. In lieu of co-operation on their part, we would have to depend primarily on information from other sources. With their cooperation, we estimate the probability of successful completion at greater than 75 percent.

ADDENDUM TO U.S. EPA CONTRACT  
WITH ENVIRODYNE ENGINEERS, INC.

PURCHASE ORDER OR CONTRACT NO. 68-02-3178

41CFR 15-7.350-2

Screening Business Information for Claims of Confidentiality

(a) Whenever collecting information under this contract, the Contractor agrees to comply with the following requirements:

(1) If the Contractor collects information from public sources, such as books, reports, journals, periodicals, public records, or other sources that are available to the public without restriction, the Contractor shall submit a list of these sources to the appropriate program office at the time the information is initially submitted to EPA. The Contractor shall identify the information according to source.

(2) If the Contractor collects information from a State or local government or from a Federal agency, the Contractor shall submit a list of these sources to the appropriate program office at the time the information is initially submitted to EPA. The Contractor shall identify the information according to source.

(3) If the Contractor collects information directly from a business or from a source that represents a business or businesses, such as a trade association:

(i) Before asking for the information, the Contractor shall identify itself, explain that it is performing contractual work for the U. S. Environmental Protection Agency, identify the information that it is seeking to collect, explain what will be done with the information, and give the following notice:

(A) You may, if you desire, assert a business confidentiality claim covering part or all of the information. If you do assert a claim, the information will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B, 41 FR 36906, September 1, 1976.

(B) If no such claim is made at the time this information is received by (the Contractor), it may be made available to the public by the Environmental Protection Agency without further notice to you.

005070



ADDENDUM TO U.S. EPA CONTRACT  
WITH ENVIRODYNE ENGINEERS, INC.

PURCHASE ORDER OR CONTRACT NO. 68-02-3178

41CFR 15-7.350-1

Treatment of Confidential Business Information

(a) The Contracting Officer, after a written determination by the appropriate program office, may disclose confidential business information to the Contractor necessary to carry out the work required under this contract. The Contractor agrees to use the confidential information only under the following conditions:

(1) The Contractor and Contractor's Employees shall:

(i) Use the confidential information only for the purposes of carrying out the work required by the contract;

(ii) Not disclose the information to anyone other than EPA employees without the prior written approval of the Deputy Associate General Counsel for Contracts and General Administration; and

(iii) Return to the Contracting Officer all copies of the information and any abstracts or excerpts therefrom upon request by the Contracting Officer, whenever the information is no longer required by the Contractor for the performance of the work required by the contract, or upon completion of the contract.

(2) The Contractor shall obtain a written agreement to honor the above limitations from each of the Contractor's Employees who will have access to the information, before the employee is allowed access.

(3) The Contractor agrees that these contract conditions concerning the use and disclosure of confidential information are included for the benefit of, and shall be enforceable by, both EPA and any affected business having a proprietary interest in the information.

(4) The Contractor shall not use any confidential information supplied by EPA or obtained during performance hereunder to compete with any business to which the confidential information relates.

(b) The Contractor agrees to obtain the written consent of the Contracting Officer, after a written determination by the

005071

appropriate program office, prior to entering into any sub-contract that will involve the disclosure of confidential business information by the Contractor to the subcontractor. The Contractor agrees to include this clause, including this paragraph (b) in all subcontracts awarded pursuant to this contract that require the furnishing of confidential business information to the subcontractor.

(5 U.S.C. 301)

[43 FR 9279. Mar. 7, 1978]

005

(ii) Upon receiving the information, the Contractor shall make a written notation that the notice set out above was given to the source, by whom, in what form and on what date.

(iii) At the time the Contractor initially submits the information to the appropriate program office, the Contractor shall submit a list of these sources, identify the information according to source, and indicate whether the source made any confidentiality claim and the nature and extent of the claim.

(b) The Contractor shall keep all information collected from nonpublic sources confidential in accordance with the clause in this contract entitled, "Treatment of Confidential Business Information" as if it had been furnished to the Contractor by EPA.

(c) The Contractor agrees to obtain the written consent of the Contracting Officer, after a written determination by the appropriate program office, prior to entering into any subcontract that will require the subcontractor to collect information. The Contractor agrees to include this clause, including this paragraph (c), and the clause entitled "Treatment of Confidential Business Information" in all subcontracts awarded pursuant to this contract that require the subcontractor to collect information.


(5 U.S.C. 301)

[43 FR 9279, Mar. 7, 1978]

The undersigned employees of Envirodyne Engineers may have access to confidential information in the course of carrying out work under Contract 68-02-3178 and hereby agree to adhere to the practices cited in 41 CFR 15-7.350-1 and 41 CFR 15-7.350-2.

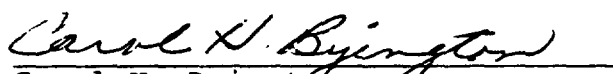
  
David C. Kennedy

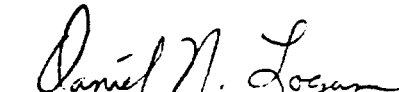
  
Shaaban Ben-Poorat

  
Thomas M. Lachajczyk


  
Ann Bronson

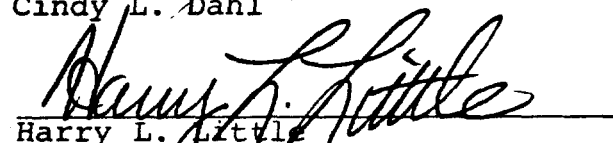
  
Albert P. Becker, III

  
Carol H. Byington

  
Daniel N. Logan

  
Cindy L. Dahl

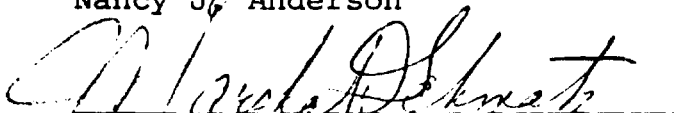
  
Robert A. Bessent


  
Harry L. Little

  
Richard M. Langer

  
C. Sue Graves

  
Nancy J. Anderson

  
Marsha D. Schmatz

  
Kathryn J. Flowers